

LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

KASCHEE PORTER
ASSOCIATE
TEL: (212) 238-4815
EMAIL: kporter@lcbf.com

120 BROADWAY
13TH FLOOR
NEW YORK, NEW YORK 10271
TELEPHONE (212) 238-4800
FACSIMILE (212) 238-4848
www.lcbf.com

One Gateway Center
22nd Floor
Newark, NJ 07102
Tel: (973) 623-2700

One Penn Center
1617 JFK Boulevard, Suite 955
Philadelphia, PA 19103
Tel: (215) 561-8540

January 31, 2022

Via ECF & Regular Mail

Hon. John P. Cronan, U.S.D.J.
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 12D
New York, NY 10007-1312

Re: *Klein v. Metropolitan Transportation Authority*
1:21-cv-07118-JPC
Our File No.: 1331-1013

Dear Judge Cronan:

We represent defendant Metropolitan Transportation Authority (“MTA”) with respect to the above-referenced-matter. We are writing with respect to the service of the plaintiff’s amended complaint and the directive that the defendants interpose their answer by February 4, 2021.

We were recently informed that Metro-North train conductor Kirk Thomas is retired. Kirk Thomas’ last known address is 401 Seneca Avenue, Mount Vernon, NY 10553. In addition, defendants respectfully request an additional 21 days to answer the amended complaint on behalf of the added individual police officers who were recently served. Defendants request this extension as there are certain protocols which the officers must follow to request defense from the MTA after they have been served.

Respectfully submitted,

/s/ Kaschee Charles-Porter

Kascheé Charles-Porter

cc: Christian Paul Enzo Klein
PRO SE
461 Riverdale Avenue - Apt. 4J
Yonkers, NY 10705

Philip J. DiBerardino, Esq.